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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 **CAROL HAGERMAN,**

13 **Plaintiff,**

14 **vs.**

15 **EQUIFAX INFORMATION SERVICES**
16 **LLC and BANK OF AMERICA N.A.**

17 **Defendants.**

Case No. 2:20-cv-02047-JCM-VCF

**DEFENDANT BANK OF AMERICA,
N.A.'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND
TO PLAINTIFF'S COMPLAINT**

FIRST REQUEST

18 Defendant Bank of America, N.A. ("BANA") moves, pursuant to Federal Rules of Civil
19 Procedure 6 of the Federal Rules of Civil Procedure, for an extension of time for BANA to answer
20 or otherwise plead in response to the Complaint. In support of this motion, BANA states as follows:

21 1. Plaintiff filed the Complaint on November 5, 2020. BANA received a copy of the
22 Summons and Complaint on or about November 12, 2020. BANA's responsive pleading is due on or
23 before December 3, 2020.

24 2. BANA is currently investigating the allegations of the Complaint and needs
25 additional time within which to conduct the investigation and respond to the Complaint. The time
26 within which to respond has not expired. BANA and plaintiff are also exchanging information
27 informally to aid with that process.
28

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3. BANA's Counsel contacted Plaintiff's Counsel to request his consent to this extension. Plaintiff's Counsel consents to BANA's request. Therefore, BANA hereby requests an additional thirty (30) days to respond to the Complaint, through January 4, 2021.

4. This motion is not made for the purpose of delay, and it will not prejudice the parties. The relief requested will not affect any other litigation deadlines in this case.

WHEREFORE, for the foregoing reasons and authorities, BANA respectfully requests that the Court grant this motion and extend BANA's deadline to respond to Plaintiff's Complaint in this case until January 4, 2021.

DATED: December 2, 2020

Respectfully Submitted,

WRIGHT, FINLAY & ZAK, LLP

/s/ Darren T. Brenner

DARREN T. BRENNER, ESQ.

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Attorneys for Defendant Bank of America, N.A.

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

12-9-2020
DATED: _____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of December, 2020 and pursuant to FRCP 5(b)(2)(E), I caused service via U.S. District Court's Case Management/Electronic Case Files (CM/ECF) system a true and correct copy of the foregoing Defendant, Bank of America, N.A.'s Motion for Extension of Time to Respond to Plaintiff's Complaint, addressed to:

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